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June 17, 2024

VIA ECF

Hon. Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *PleasrDAO v. Shkreli*; Case No. 1:24-cv-04126**  
**Letter Request to Extend Current Deadlines and Adjourn June 25 TRO Hearing**

Dear Judge Chen:

Our firm is counsel for Defendant Martin Shkreli (“Defendant”) in the above referenced matter. We write with the consent of Plaintiff PleasrDAO (“Plaintiff” and, together with Defendant, the “Parties”) pursuant to Rule 1(F) of Your Honor’s Individual Rules of Practice to respectfully request an extension of the current deadlines as well as an adjournment of the June 25, 2024 Show Cause Hearing. The current schedule, with the proposed extension dates, is as follows:

Event	Current Deadline	Proposed Deadline
Defendant’s Deadline to File Responsive Papers to the TRO Application	June 20, 2024	July 18, 2024
Plaintiff’s Deadline to File Reply Papers for their TRO Application	June 24, 2024	August 5, 2024
In Person Show Cause Hearing	June 25, 2024 at 12pm	A date and time convenient for the Court after August 5, 2024
Defendant’s Deadline to Respond to Complaint	July 4, 2024	August 15, 2024

The parties have agreed to waive any objections to personal jurisdiction, including service of process, and an extension of the Temporary Restraining Order until the date of the new hearing. Accordingly, the agreement to the revised briefing schedule is contingent and dependent on the Court ordering that: (i) Defendant has waived any objections to personal jurisdiction, including the service of process on Plaintiff; and (ii) in accordance with Federal Rule of Civil Procedure 65(b)(2), there is an extension of the terms of this Court’s June 11, 2024 Temporary Restraining Order, until the date of the adjourned show cause hearing.

This is the first time the Parties have requested an extension of time for these deadlines and this extension will not impact any other deadlines set by the Court for this matter.

We thank the Court for its time and attention in this matter.



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Respectfully submitted,

/s/ Edward Andrew Paltzik

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